

Transmitted via Overnight Courier

GE 159 Plastics Avenue Pittsfield, MA 01201

January 3, 2007

Mr. Dean Tagliaferro EPA Project Manager United States Environmental Protection Agency c/o Weston Solutions, Inc. 10 Lyman Street Pittsfield, MA 01201

Re: GE-Pittsfield/Housatonic River Site Lyman Street Area (GECD430) Summary of November 2006 Inspection Activities

Dear Mr. Tagliaferro:

On November 29, 2006, the General Electric Company (GE) performed its first post-remediation inspection of the properties located within the Lyman Street Area, west of Lyman Street, at which remediation activities have been performed. As shown on Figure 1, the Lyman Street Area includes six commercial parcels (four of which, Parcels I9-4-14, -19, -25, and -203, have recreational portions) and two recreational parcels. In accordance with GE's *Final Removal Design/Removal Action Work Plan for Lyman Street Area* (Final RD/RA Work Plan), which was submitted to EPA in September 2005 and conditionally approved by EPA on March 6, 2006, GE conducted remediation actions at the six properties west of Lyman Street in 2006, completing those actions in September 2006. (Remediation activities for the properties east of Lyman Street are anticipated to be performed in summer 2007.) In addition, vegetation restoration activities were conducted at two of these parcels (Parcels I9-4-14 and I9-4-19), as described in the revised Vegetation Restoration Plan for Lyman Street Area (west of Lyman Street) provided in Attachment 3 to GE's October 5, 2006 Addendum to Supplemental Information Package.

The November 2006 inspection was performed for areas that were backfilled and restored during implementation of the remediation actions. This inspection was conducted in accordance with the Post-Removal Site Control/Restoration Project Monitoring and Maintenance Plan contained in Attachment F to the Final RD/RA Work Plan, as revised and set forth in Attachment H to an April 4, 2006 Addendum to the Final RD/RA Work Plan, which was approved by EPA on April 13, 2006.

The November 2006 inspection consisted of visual observations of the backfilled/restored areas, focusing on the following: (a) any areas where excessive settlement has occurred relative to the surrounding areas; (b) any drainage or growth problems due to possible over-compaction of the backfill materials; (c) in areas where vegetation has been established, the condition of the vegetation, including any evidence of stressed vegetation or sparse cover; and (d) other conditions that could jeopardize the performance of the completed remediation actions. The inspection also evaluated whether the vegetation that has been planted is growing as anticipated.

To document the results of the November 2006 inspection, GE completed an Inspection Summary and Checklist for each property subject to inspection. Copies of the completed forms are provided in Attachment A. These forms will also be used in the future to continue to document such inspections and track the completion of identified maintenance activities.

In summary, as indicated on the attached forms, the November 2006 results indicated that the inspected properties at the Lyman Street Area were in good overall condition, with certain restoration activities remaining to be conducted in December 2006 (i.e., tree installation at Parcel I9-4-14 and parking lot line painting at Parcels I9-4-25/202) and with a couple of minor maintenance actions necessary. Specifically, the inspection identified the need for the following maintenance activities:

- Repair erosion/sink hole observed on top of bank along Housatonic River on Parcel I9-4-19; and
- Repair fence collar on Parcel I9-4-201.

The above maintenance activities will be conducted prior to the spring 2007 inspection.

In accordance with the above-referenced Post-Removal Site Control/Restoration Project Monitoring and Maintenance Plan, the backfilled/restored areas at the above properties west of Lyman Street will be inspected every six months for a period of one year and annually thereafter (subject to subsequent EPA approval of a different frequency). Future inspections are anticipated to occur in May and October of 2007 and annually thereafter. Following each inspection, an inspection report will be prepared and submitted to EPA.

Please call me if you have any comments or questions.

Sincerely

Richard Gates/EGB

Richard W. Gates

Remediation Project Manager

### Attachment

V:\GE\_Pittsfield\_CD\_Lyman\_St\Reports and Presentations\Inspections\008711324Ltr.doc

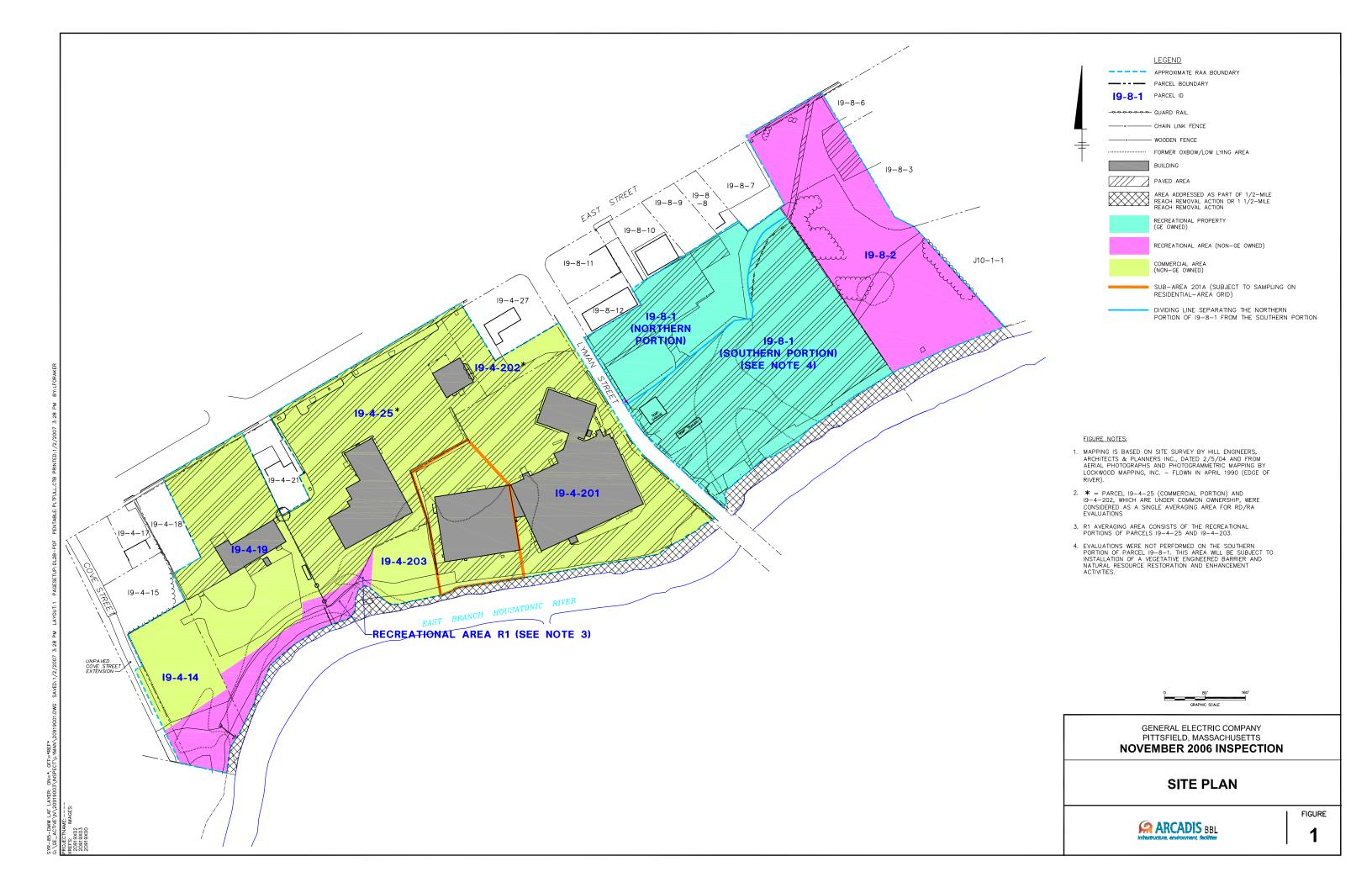
cc: Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA\*
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Jane Rothchild, MDEP\*
Anna Symington, MDEP\*
Nancy E. Harper, MA AG
Dale Young, MA EOEA\*
Linda Palmieri, Weston (2 copies)

Mayor James Ruberto, City of Pittsfield Michael Carroll, GE\*
Roderic McLaren, GE\*
Peter Wojcik, GE\*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter
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<sup>\*</sup> cover letter only



Figure





# Attachment A

Completed Inspection Forms

# LYMAN STREET AREA

PARCEL I9-4-14				
I. GENERAL INFORMATION				
Inspection Date:	11/29/06			
Conducted By:	Paolo Filippetti			
Weather Conditions:	Cloudy - 47°F			
Date of Last Inspection:	<del></del>			
II. INSPECTION SUMMARY				
cover erosion, areas of b	Barriers (Note any physical changes since last inspection; note evidence of any of the following: soil pare/sparse vegetation, uneven settlement, surface water ponding, burrows, vehicle ruts; exposed ents; proper functioning of water management features; unauthorized excavation; unauthorized uses of			
NA				
INA				
surface water ponding, b	as (Note any physical changes since last inspection; note evidence of excessive settlement, soil erosion, purrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, etc.)			
<ul> <li>All areas in good condition</li> </ul>	on.			
evidence of stressed/spa	(Note any physical changes since last inspection; note general condition of vegetative cover (e.g., arse cover) and other landscaping items (trees, shrubs, etc.)  Ing the month of December 2006.			
	onfirm that repair/maintenance measures identified during prior inspection have been performed; note any ns, including parcel-specific restoration activities.			
- None				
III. FOLLOW-UP MAINTENA	NCE AND REPAIR ACTIVITIES			
- None				

# LYMAN STREET AREA

PARCEL I9-4-19					
I. GENERAL INFORMATION					
Inspection Date:	11/29/06				
Conducted By:	Paolo Filippetti				
Weather Conditions:	: Cloudy - 47°F				
Date of Last Inspect	ion:				
II. INSPECTION SU					
cover erosion,	gineered Barriers (Note any physical changes since last inspection; note evidence of any of the following: soil areas of bare/sparse vegetation, uneven settlement, surface water ponding, burrows, vehicle ruts; exposed r components; proper functioning of water management features; unauthorized excavation; unauthorized uses of				
NA					
1471					
	ckfill Areas (Note any physical changes since last inspection; note evidence of excessive settlement, soil erosion, conding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, etc.)				
	le on top of bank along Housatonic River.				
	ion Areas (Note any physical changes since last inspection; note general condition of vegetative cover (e.g.,				
	ressed/sparse cover) and other landscaping items (trees, shrubs, etc.)				
- All areas in goo	od condition.				
	ations (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any observations, including parcel-specific restoration activities.				
- None					
III. FOLLOW-UP MA	AINTENANCE AND REPAIR ACTIVITIES				
- Erosion/sinkhol	le described above to be addressed in spring of 2007.				
	· ·				

# LYMAN STREET AREA

PARCEL 19-4-25/202				
I. GENERAL INFORMATION				
Con Wea	ection Date: ducted By: ther Conditions: of Last Inspection:	11/29/06 Paolo Filippetti Cloudy - 47°F		
II. IN	NSPECTION SUMMARY			
1.	cover erosion, areas of k	Barriers (Note any physical changes since last inspection; note evidence of any of the following: soil pare/sparse vegetation, uneven settlement, surface water ponding, burrows, vehicle ruts; exposed ents; proper functioning of water management features; unauthorized excavation; unauthorized uses of		
	NA			
<b>2.</b>		ns (Note any physical changes since last inspection; note evidence of excessive settlement, soil erosion, nurrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, etc.)		
3.		s (Note any physical changes since last inspection; note general condition of vegetative cover (e.g., arse cover) and other landscaping items (trees, shrubs, etc., on.		
4.		onfirm that repair/maintenance measures identified during prior inspection have been performed; note any ns, including parcel-specific restoration activities.		
-	Parking lot paint lines to	be completed during the month of December 2006.		
III. F		NCE AND REPAIR ACTIVITIES		
-	None			

# LYMAN STREET AREA

PARCEL I9-4-201				
I. GENERAL INFOR	MATION			
Inspection Date:	11/29/06			
Conducted By:	Paolo Filippetti			
Weather Conditions:	Cloudy - 47°F			
Date of Last Inspection				
•				
II. INSPECTION SU	MMARY			
cover erosion, a	gineered Barriers (Note any physical changes since last inspection; note evidence of any of the following: soil areas of bare/sparse vegetation, uneven settlement, surface water ponding, burrows, vehicle ruts; exposed components; proper functioning of water management features; unauthorized excavation; unauthorized uses of			
NA				
INA				
	kfill Areas (Note any physical changes since last inspection; note evidence of excessive settlement, soil erosion, onding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, etc.)			
- All areas in goo				
evidence of stre	on Areas (Note any physical changes since last inspection; note general condition of vegetative cover (e.g., essed/sparse cover) and other landscaping items (trees, shrubs, etc.,			
<ul> <li>All areas in goo</li> </ul>	d condition.			
	tions (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any bservations, including parcel-specific restoration activities.			
- Fence along Ho	ousatonic River (next to USC box) needs attention, collar needs to be fixed.			
III. FOLLOW-UP MA	AINTENANCE AND REPAIR ACTIVITIES			
- Repair fence.				

# LYMAN STREET AREA

PARCEL I9-4-203					
I. GENERAL INFORMATION					
Ins	pection Date:	11/29/06			
Conducted By:		Paolo Filippetti			
We	ather Conditions:	Cloudy - 47°F			
Dat	te of Last Inspection:	<del></del>			
	·				
II.	INSPECTION SUMMARY				
1.	cover erosion, areas of b	Barriers (Note any physical changes since last inspection; note evidence of any of the following: soil pare/sparse vegetation, uneven settlement, surface water ponding, burrows, vehicle ruts; exposed ents; proper functioning of water management features; unauthorized excavation; unauthorized uses of			
	NA				
	14/1				
2.		as (Note any physical changes since last inspection; note evidence of excessive settlement, soil erosion, purrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, etc.)			
-	All areas in good condition				
	gera commi				
3.		s (Note any physical changes since last inspection; note general condition of vegetative cover (e.g., arse cover) and other landscaping items (trees, shrubs, etc.,			
-	All areas in good condition				
	<u> </u>				
4.		onfirm that repair/maintenance measures identified during prior inspection have been performed; note any ns, including parcel-specific restoration activities.			
-	None				
III.	FOLLOW-UP MAINTENA	NCE AND REPAIR ACTIVITIES			
-	None				